



July 29, 2011

The Honorable Julius Genachowski
Chairman, Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

RE: FCC File No. SAT-MOD-20101118-00239

Dear Chairman Genachowski:

The East Bay Municipal Utility District (EBMUD), headquartered in Oakland, California, provides drinking water to 1.3 million people over a 331-square mile area and wastewater treatment service to 650,000 people over an 88-square mile area. The infrastructure necessary to support these services is vast and includes seven water supply reservoirs, 90 miles of three large-diameter aqueducts, five water treatment plants, 64 pumping plants, 170 distribution reservoirs, over 3000 miles of distribution water pipelines, four wastewater treatment plants, and over 29 miles of wastewater pipelines.

In order to manage this amount of infrastructure that EBMUD has built over the last century, extensive surveying and mapping for asset management, capital improvement projects, right of way acquisitions, and infrastructure renewal is required. One of the primary tools used is precision, survey-grade global positioning system (GPS) methods to provide surveying, mapping and geo-referencing. EBMUD has made a considerable investment in equipment and services that are based upon this GPS technology and relies heavily on the datums established by the geophysical research community who have over 100 million dollars invested in GPS infrastructure.

The proposal from LightSquared Subsidiary LLC to dramatically expand the terrestrial use of the Mobile Satellite Service spectrum (MSS) by broadcasting from a network of 40,000 cell towers will overwhelm and widely disrupt the established GPS signals. Though the modified proposal currently under consideration by the Federal Communications Commission indicates that it will affect only one percent of GPS users, the precision GPS-user community is part of that one percent. Accordingly, the modified proposal is expected to adversely affect the precision GPS-user community's ability, including EBMUD's, to properly manage its infrastructure.

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We urge you to take steps to objectively and unequivocally ensure that the existing GPS infrastructure and the established GPS user base, including deployed precision GPS receivers are protected. If you would like any additional information regarding these comments, please contact Xaxier Irias at (510) 287- 1002 or Olujimi (Jimi) Yoloye at (510) 287-1687.

Sincerely,

A handwritten signature in blue ink, appearing to read "Alexander Coate".

Alexander R. Coate
General Manager

AC:MD:OY

cc: Senator Barbara Boxer
Senator Dianne Feinstein
Representative John Garamendi
Representative Barbara Lee
Representative Jerry McNerney
Representative George Miller
Representative F. Pete Stark